

United States District Court
For the
District of Massachusetts

Jury Trial Demanded
Case No.

Craig Cromartie
(Pro-Se-Plaintiff)

-V-

Old Colony Correctional Center
Well Path

Department Of Corrections

Stephen A. Kennedy

Matthew Oneil

Dennis W. Butler

Russell W. Monroe

Alexander J Adorno

John F. SchoField

Kevin A. Riquinha

Kyle D. Brouillette

Et. Al

(Sued in Dual Capacities)

FILED
IN CLERKS OFFICE
2020 OCT 26 AM 2:16
U.S. DISTRICT COURT
DISTRICT OF MASS.

Verified Civil Complaint

Plaintiff

I, Craig Cromartie, respectfully move
in this Honorable Court for compensation
and treble and punitive damages.

I currently reside at the Old
Colony Correctional Center in Bridge-
water and am writing this complaint
in accordance with the PLRA in
the capacity of a Pro-Se Plaintiff.
All the series of complained of
events have occurred while the
DGC has had me classed and
housed here at O.C.C. in Bridgewater, Ma.

Defendants

The prior scribed Defendants are all either employees, companies, institutions, and/or departments that are either operating or are employed in the Commonwealth Of Massachusetts

Jurisdiction

I, Craig Cromartie, am writing this complaint in accordance with 42 U.S.C. 1983 and 42 U.S.C. 1997 and respectfully assert jurisdiction under the above cited statutes codes of the United States in this Honorable Federal Court ruling in this District of Massachusetts.

Statement Of Claims

- 1) On Wednesday June 24th, 2020 I, Craig Cromartie, was illegally assaulted and excessively beat unconscious.
- 2) At 4:29 Officers employed and hired by the Massachusetts Department of Corrections randomly ran into my assigned cell and sprayed my face with O.C. spray while in restraints.
- 3) After the 103 CMR 505.10, M.G.L.C., and 8th Amendment violating O.C. spraying, I was choked to the point I couldn't breathe as Correctional Officers forcibly **TRIED** to put their fingers down my throat because they believed that I was concealing Suboxin Strips in my mouth.

4) Before being punched and Flash light beating Then used as a Prop to open ^{Mouth}, a second round of O.C. spray was deployed yet this time in my mouth and down my throat.

5) After gaining consciousness, I was forced to walk over 300 yards with restraints cutting my circulation off and tearing my skin with each dreadful step.

6) Following this painful, dreadful, 103 CMR 505.11 violating, Unconstitutional walk, I was stripped naked and locked in a cell for 6 straight days without a shower, a toilet, or a sink

7) Title 105 CMR 451 disapproves of the condition of the urine, feces, soiled, said cell I was force to sleep in with no socks, blankets, or pillows.

8) The whole six days the ankle cuffs tight, skin-tearing, blood circulating depriving, restraints weren't removed. ^{EVEN} After **MAKING Numerous Complaints**

9) 103 CMR 505.11(4), (6), and (11) ^{SP} disapprove of this harsh confinement as well

10) In these said 6 days I was forced to defecate on myself

11) I am over 50 years old with asthma and asked numerous officers, nurses, and therapist for a mask during these pandemic times of the Cov-19 era. The cell I was placed in was never quarantined, cleaned, or sanitized and

is a cell used when inmates come from other Jails, Court, or from hospitals, stool eye ball watches, & ^{test} urines

12) All of the prior, enumerated, said incidents have been grieved. I also went to the extreme of writing the Defendant Superintendent Kennedy myself even though he had knowledge for 103 CMR 505 mandates so. I even wrote the A.G.

13.) M.G.L.C 124 §§ 1(b), (c) and (g) & C. 127 § 33 authorizes the said regulations of which have been disregarded and violated.

Relief Requested

My 8th amendment rights have been - violated on so many Levels and disregarded by the defendants in the following ways

- 1) Harsh Confinement - requesting \$100,000 for the soiled by feces and urine cell. \$100,000 for the restraints not being removed for 6 days in that cell. \$100,000 for being forced to defecate on myself.
- 2) Excessive Force \$100,000 for being hit in head with flashlight, punched, and "CHOKED OUT" ^{AS QUOTED} ^{ordered} \$100,000 for the 2 different deployments of O.C. spray to my face and down my throat forcing me to gag and choke on flaming vomit. \$100,000 for the skin tearing forced restraint walk. \$100,000 for losing my hearing due to still unattended head trauma, and physical therapy to toe, foot AREA.

3) Intentional Emotional Distress
 \$ 100,000 For the P.T.S.D now
 experienced From the beating, 6 days of
 unhumane practices, and adm. disregard.
 And being forced to sleep in 4 Point restraints, eat, deprived sanitizing

Certification And Closing
 Under Federal Rules of
 Civil Procedure 11, by signing below,
 I certify to the best of my
 knowledge, information and belief
 that this complaint is true under
 the pain and penalties of perjury.
 It is also prepared and supported
 by existing Constitutional law.

The Factual contention has
 evidentiary support and this
 Complaint otherwise complies with
 the requirements of rule 11. trial by Jury
 and all Fees, Attorney Fees, Filing Fees, And Cost be refunded.
 as plaintiff prays for relief. Signed X Craig Gomastie
 Pro Se

*** Plaintiff preserves the right
 to amend this complaint.